

Department of Defense Environmental Data Quality Issues: *Is It Really Perchlorate?*



National Monitoring Conference
Bill Ingersoll, NAVSEA 04XQ (Labs)
Navy Quality and Accreditation Office
May 2004

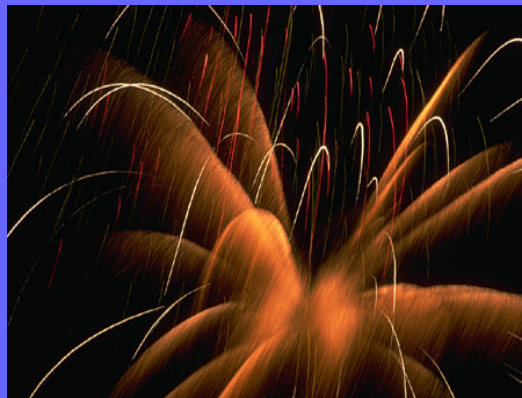


Topics



- ❖ Data Quality Issues Affecting Missions and Operations
- ❖ Perchlorate Testing
 - Current Status of Methods
 - Is It Really Perchlorate?
 - Emerging Technology
- ❖ Promoting Sound Science

Perchlorate



Natural and Anthropogenic Sources

- ❖ Chilean fertilizer deposits
- ❖ New Mexican potash
- ❖ Canadian potash
- ❖ Californian hanksiteh
- ❖ Bolivian playa crusts
- ❖ Rocket fuel
- ❖ Fireworks
- ❖ High explosives
- ❖ Flares
- ❖ Herbicides
- ❖ Automobile airbags
- ❖ Tracer munitions
- ❖ Detergents

Data Quality Issues

Affect Mission and Operations

DoD EDQW Charter, DUSD(ES) Sept. 1996:

- ❖ Develop DoD policy on sampling, testing & data quality
- ❖ Identify Best Practices; standardize across DoD
- ❖ Coordinate responses to legislative & regulatory actions
- ❖ Represent DoD on environmental data quality Issues
- ❖ Respond to DoD IG reports



Data Quality Issues

Prescriptive vs. Performance-Based Methods

- ❖ Office of Water
 - Prescriptive methods
 - Promulgated (e.g. 40 CFR 136)
- ❖ Office of Solid Waste and Emergency Response
 - Performance Based Measurement System (PBMS)
 - SW-846 Methods Manual encourages method modification to meet project needs
 - Performance vs. test procedure oriented
 - Criteria describe data quality needs
- ❖ State Modifications to PBMS
 - Some states legislate SW-846 Methods as requirements
 - Performance-based method modifications are not allowed

Data Quality Issues

Example: Perchlorate

- ❖ Unregulated Contaminant Monitoring Rule (UCMR) List 1 constituent
- ❖ Health effects controversial
- ❖ Currently 10 states (AZ, CA, FL, IL, MA, MD, NV, NM, NY, and TX) have health advisory limits (1-31 ppb)
- ❖ Increasing regulatory pressure to analyze for trace levels (low ppb, sub-ppb)
- ❖ Inadequate consideration for complex matrices, method limitations, and measurement uncertainty

Data Quality Issues

DoD Interim Policy on Perchlorate, Sept 2003

Components must collect and compile perchlorate data for:

- ❖ *Drinking water supplies* subject to Unregulated Contaminant Monitoring Rule (UCMR)
- ❖ *Wastewater discharges* permitted under National Pollutant Discharge Elimination System (NPDES)
- ❖ *Environmental restoration sites* where release may have occurred and complete human exposure pathway is likely to exist (IR)
- ❖ *Range assessments* conducted under Munitions Action Plan and Defense Planning Guidance

Perchlorate Testing

Current Status of Methods

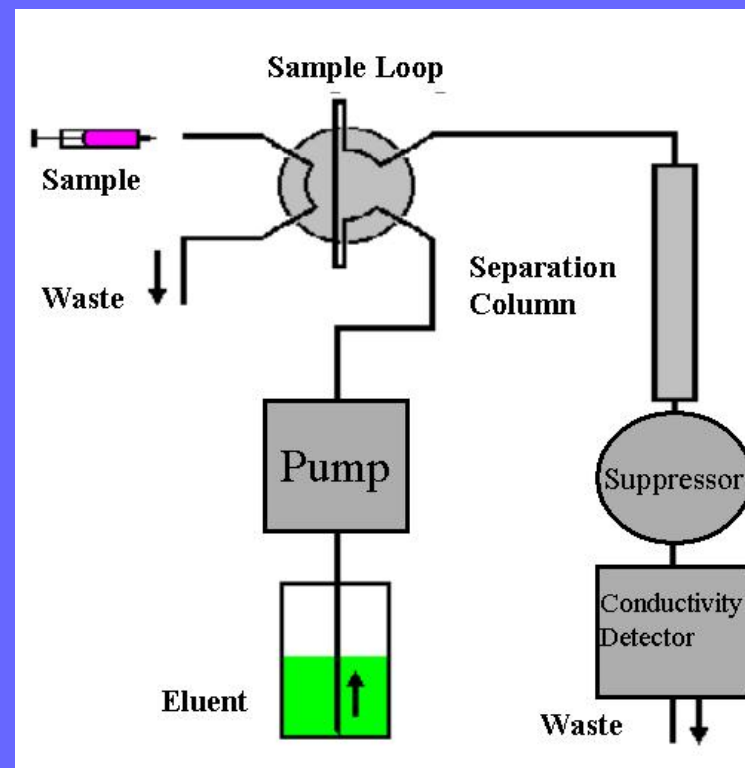
- ❖ EPA Method 314.0
 - Ion Chromatography/conductivity detection
 - Drinking Water method
- ❖ SW-846 Method 9058 (Nov 2000 Draft)
 - IC/Conductivity detection (with suppressor)
- ❖ PBMS
 - Ion or Liquid Chromatography/Mass Spectrometry (IC or LC/MS)
 - IC or LC/MS/MS
 - Proprietary methods (Modified Method 8321a)

No current, standardized method using MS

EPA Method 314.0

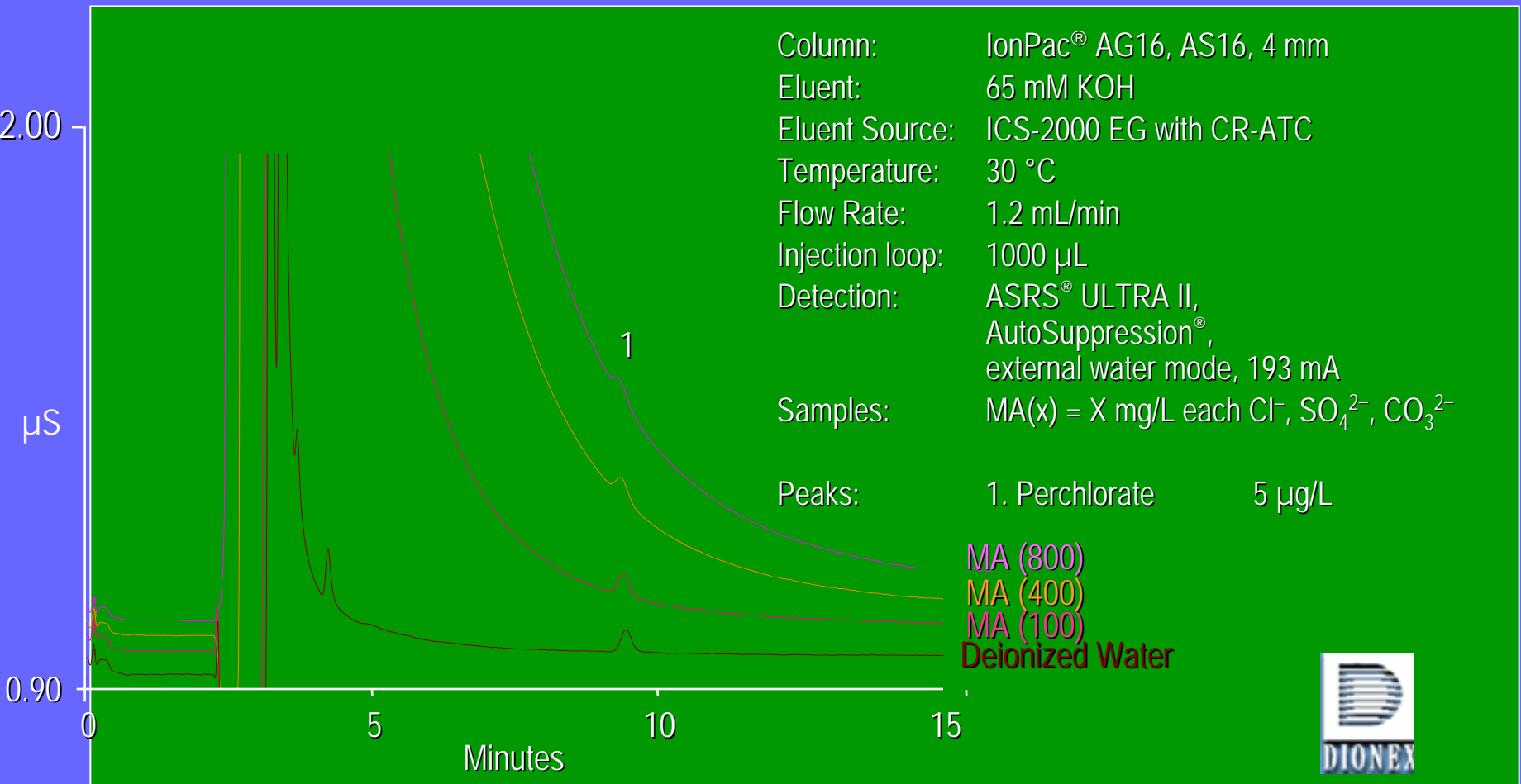
Ion Chromatography/Conductivity

- ❖ Currently the only EPA-approved method
- ❖ Method Reporting Level (MRL) = 4 ppb (deionized water)
- ❖ Compound identification based on **retention time**
- ❖ Conductivity detector is non-specific
 - Responds to any substance that will conduct electric current



EPA Method 314.0

Sensitivity decreases with increasing ionic strength

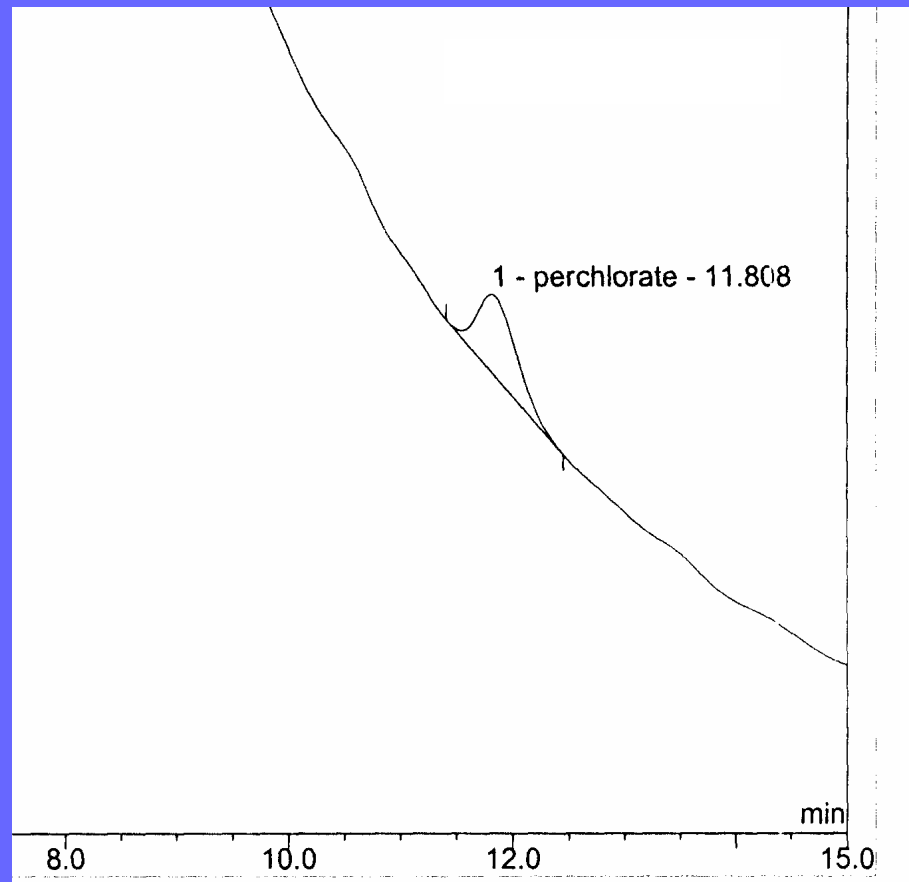


5 ppb perchlorate standard

Is it Really Perchlorate?

Example #1

- ❖ Treated rocket-motor wastewater, diluted 20X due to high conductivity
- ❖ Method 314.0 results: 670 ppb
(Same result for 2 labs)
- ❖ LC/MS/MS results: non-detect

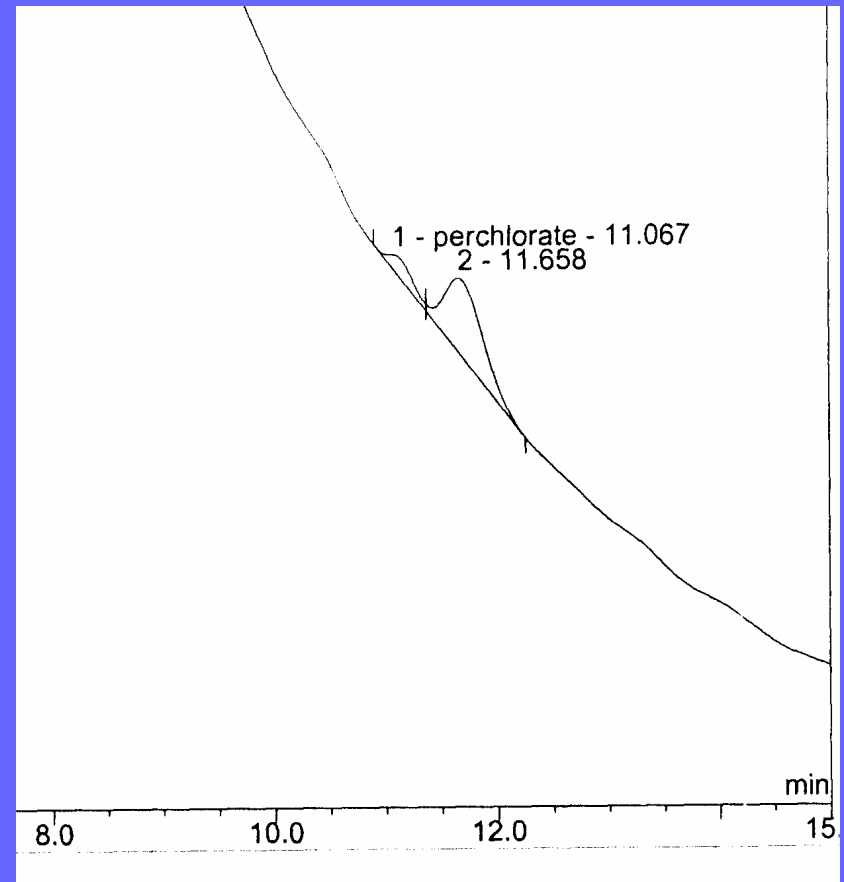


Is it Really Perchlorate

Example #1 (cont'd)

To check Method 314:

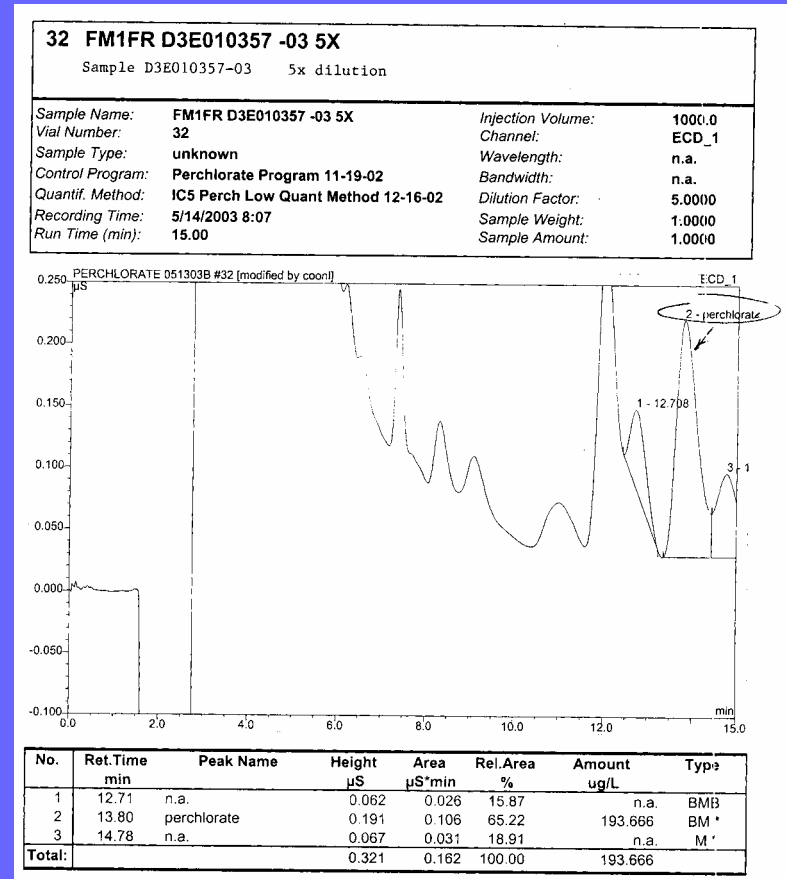
- ❖ 200 ppb perchlorate added to sample
- ❖ Spiked peak eluted with 0.6 minute retention-time shift
- ❖ Original peak due to interference, not perchlorate
- ❖ False positive occurred in every sample from site



Is it Really Perchlorate?

Example #2

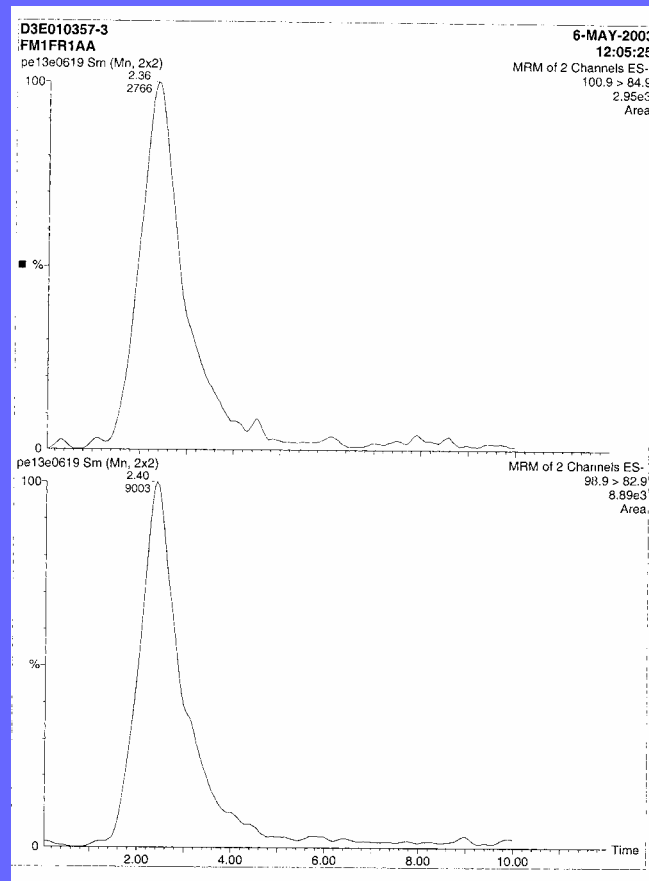
- ❖ Cooling tower water sample diluted 5X because of high conductivity
- ❖ Method 314.0 result: 194 ppb



Is it Really Perchlorate?

Example #2 (cont'd)

- ❖ Undiluted sample analyzed by LC/MS/MS
- ❖ All four ions detected in proper 3:1 ratio
- ❖ LC/MS/MS result: 0.98 ppb



Is it Really Perchlorate?

Example #3

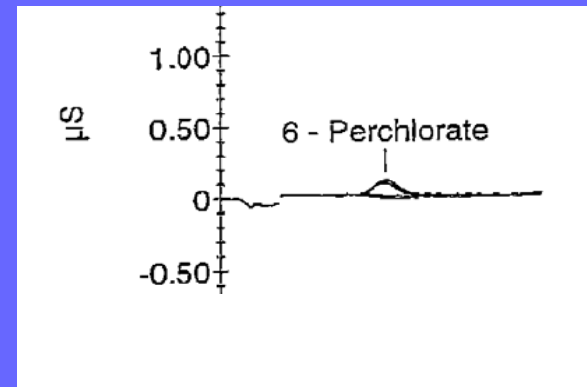
- ❖ Fluidized-bed reactor effluent from perchlorate remediation
- ❖ Matrix contains high organic and chloride concentrations
- ❖ Method 314.0 result: 220 ppb
- ❖ LC/MS/MS result: < 5 ppb
- ❖ Regulator now willing to accept LC/MS/MS

Is it Really Perchlorate?

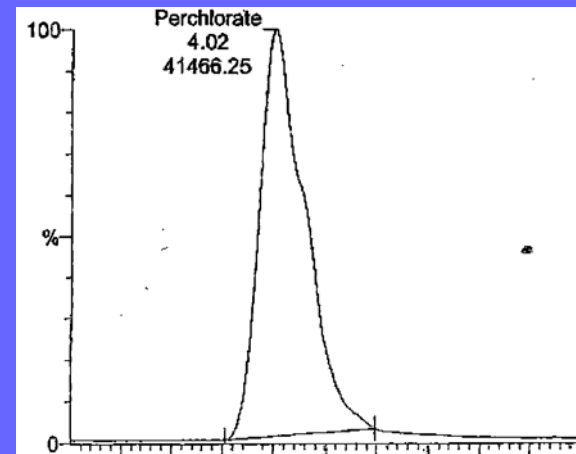
Example #4

Groundwater Sample

Method 314.0 result: 15 ppb



IC/MS/MS result: 5.64 ppb



Emerging Technology

October 2003 Perchlorate Testing Roundtable

- ❖ Jointly sponsored by EDQW and IDQTF
- ❖ Held in conjunction with EPA Region 6 QA Conference (23 Oct 2003, Dallas)
- ❖ Convened technical experts (chemists) from:
 - DoD, EPA and other federal agencies
 - States
 - Academia
 - Analytical laboratories, instrument manufacturers

Emerging Technology Roundtable Objectives

- ❖ Discuss current and developing technologies
- ❖ Identify most promising technologies
- ❖ Recommend path forward for method development

*Presentations and Summary can be
viewed and downloaded
www.navylabs.navy.mil*

Emerging Technology

Overview

- ❖ 'Improved' Ion Chromatography (IC)
- ❖ Ion or Liquid Chromatography (IC or LC) with single or dual Mass Spectrometry (MS)
- ❖ Others
 - Ion-Selective Electrode (ISE)
 - Colorimetry
 - Capillary Electrophoresis
 - Ion Mobility/MS (FAIMS/MS)

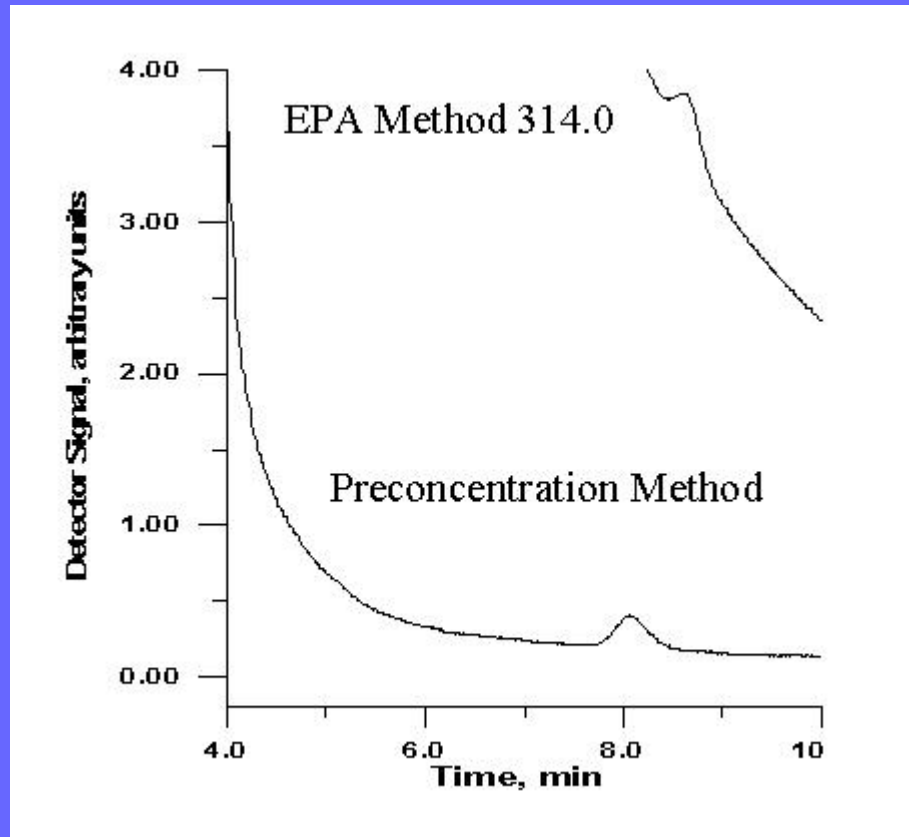
Emerging Technology

Improved Ion Chromatography

- ❖ Preconcentration to improve sensitivity
- ❖ Pre-column sample cleanup to reduce ionic strength
- ❖ Dual column separation to reduce potential for false positives

Emerging Technology

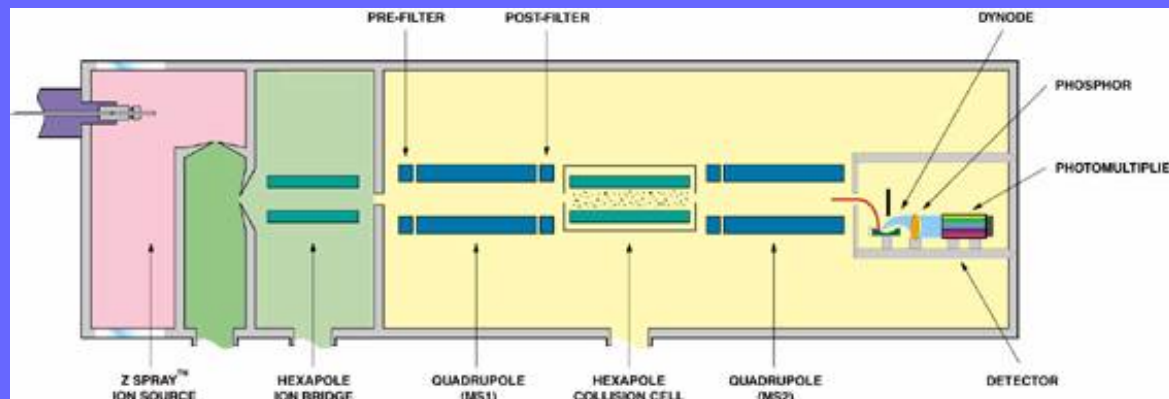
Improved Ion Chromatography (cont'd)



Emerging Technology

IC or LC with single or dual Mass Spectrometer

- ❖ IC separation & electrospray ionization
- ❖ First quadropole
 - MS monitoring
99 & 101 m/z
- ❖ Collision cell (loses an oxygen)
- ❖ Second quadropole
 - MS monitoring
83 & 85 m/z

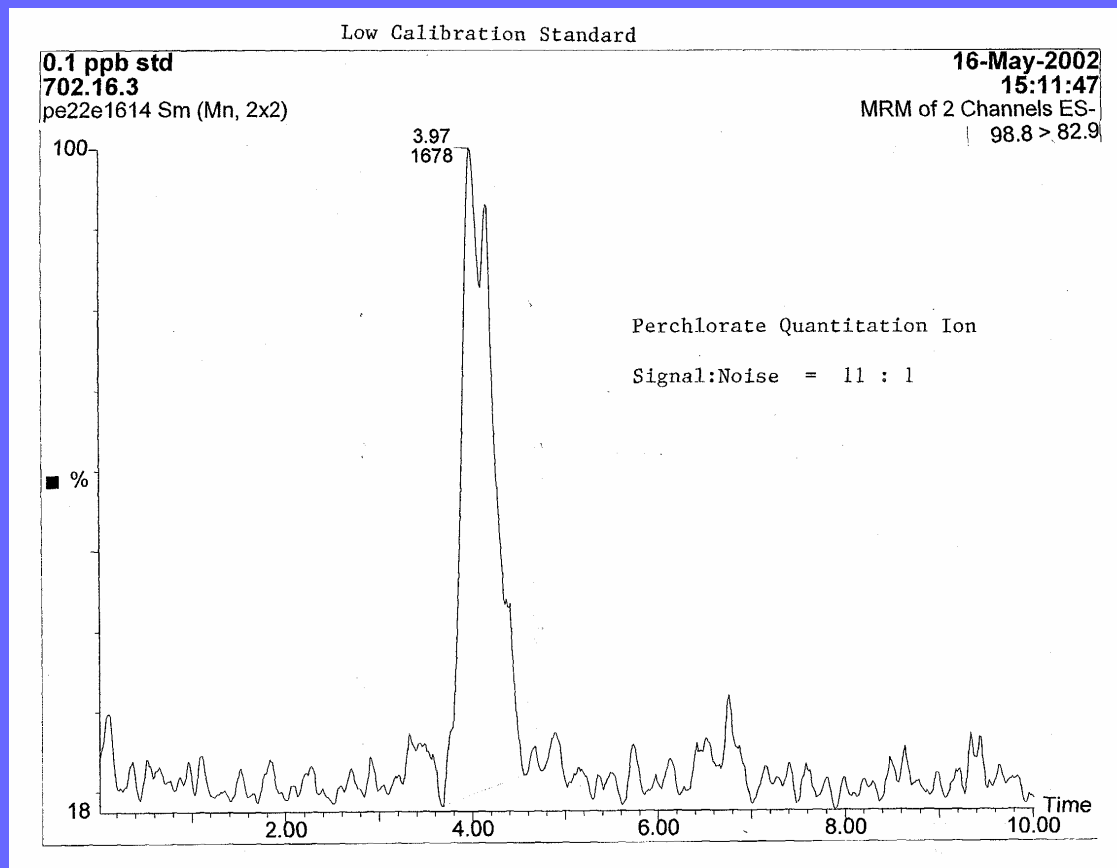


Single MS monitors two ions and one mass ratio

Dual MS monitors four ions and two mass ratios
(Check for 3:1 ion ratio)

LC/MS/MS Sensitivity

0.1 ppb standard in DI water (m/z 83)
calculated Method Detection Limit = 0.06ppb)



Performance Summary

IC or LC with Single or Dual MS

- ❖ Greatly improved perchlorate selectivity and sensitivity
 - Positive identification of perchlorate ion
 - Higher confidence in low-level measurements
 - Sensitivity affected little by changes in ionic-strength (e.g., real world samples)
 - ♦ Water taken from the Great Salt Lake and diluted ten fold. Conductivity = 21000 μ S MRL 2 ppb.
 - MRL of 0.2 ppb or lower
- ❖ Applicable to analysis of complex environmental matrices
- ❖ Commercially available as modified SW-846 Method 8321a

Method Performance Comparison

Groundwater Samples

Performance Characteristics	Improved IC	IC or LC/MS	IC or LC/MS/MS
Approximate Working range	1-40 ppb	0.1-10 ppb	0.1-10 ppb
MRL	0.5 – 5 ppb [*]	0.2 ppb	0.2 ppb
Approximate Cost	\$75 - \$125	\$125 - \$150	\$200 - \$250

**dependent on matrix and type of improvement*

Promoting Sound Science

Roundtable Summary

- ❖ Proposed Method 9058 should not be finalized as written
- ❖ Method 314.0 modifications can improve sensitivity but not selectivity
- ❖ Positive results for perchlorate obtained using Method 314.0 should be confirmed using definitive technology (e.g. MS)

Promoting Sound Science

Roundtable Next Steps

- ❖ Provide comments on proposed SW-846 Method 9058 (complete)
- ❖ Facilitate process for development/approval of methods employing MS
- ❖ Characterize background occurrence of perchlorate
- ❖ Pursue development of DoD Guidance for sampling and testing of perchlorate
- ❖ Institutionalize the joint roundtable approach for technical problem-solving

Promoting Sound Science

EDQW Interim Guidance for Perchlorate Testing

Laboratory requirements:

- ❖ Quality systems conformance to DoD QSM
- ❖ Nationally-accepted accreditation
- ❖ Approval by one or more DoD Component(s)
- ❖ Matrix-specific proficiency-testing demonstration

Promoting Sound Science

EDQW Interim Guidance for Perchlorate Testing

Method requirements:

- ❖ Method Reporting Limit demonstration through analysis of a standard at the MRL
- ❖ MRL verification with each batch of samples
- ❖ Calibration and quality control that meet or exceed specifications of Method 314.0
- ❖ *Confirmation of non-specific results (i.e. Ion Chromatography) by definitive test methods*

Promoting Sound Science

Perchlorate Testing Update

DoD:

- ❖ EDQW Interim Sampling & Testing Guidance issued by DASN(E) Feb '04
- ❖ Perchlorate QAPP Handbook under development

EPA/ORD & OGW/DW Methods to be finalized Summer '04

- ❖ 314.1 – IC/Conductivity
MRL – 0.5 ug/L
- ❖ 330.0 – IC/MS
MRL – 0.2 ug/L
- ❖ 331.0 – LC/MS/MS
MRL – 0.1 ug/L

The Payoff

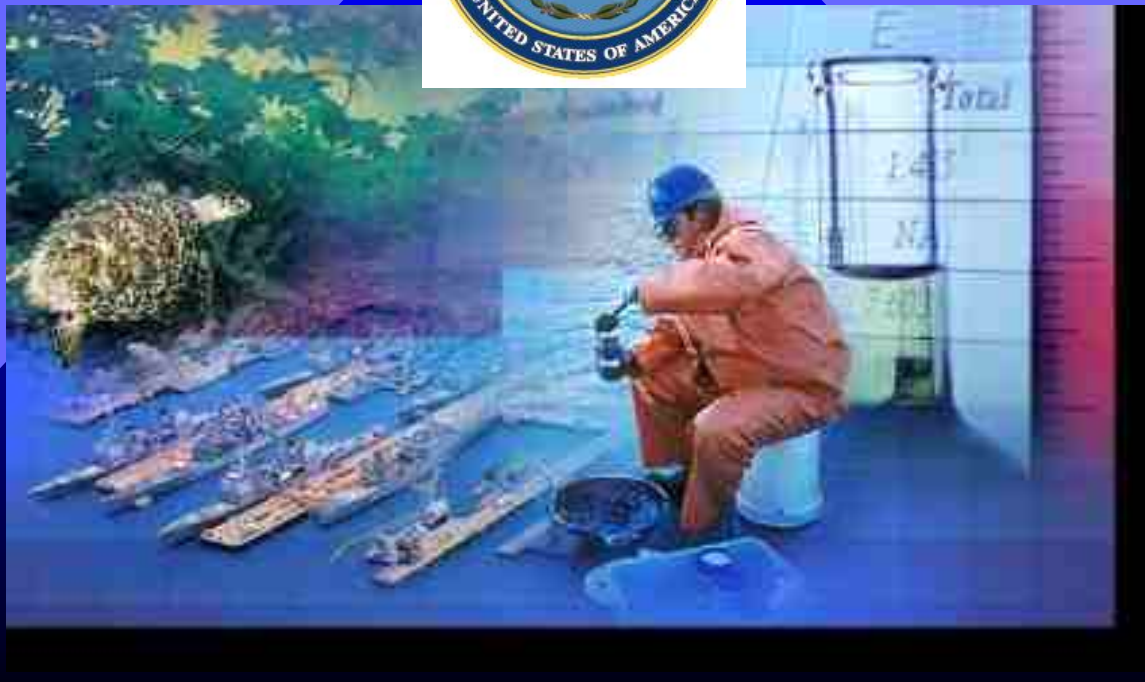
Cost-effective data collection

Reproducible data

Sound environmental decisions

Improving Environmental Data Quality

... Because the Right Decisions Require Quality Data



SampleJH@navsea.navy.mil
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